

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:20-mj- <u>288</u>
)	
CARLISS TOWANDA MIMS KIZER,)	
)	
Defendant.)	

AFFIDAVIT IN SUPPORT OF A CRIMINAL INFORMATION

I, Maureen O'Callahan, being duly sworn, state:

INTRODUCTION

1. I am a Federal Law Enforcement Officer with the National Park Service (NPS) at Manassas National Battlefield Park. I was appointed as a federal law enforcement officer with NPS in 2015. My responsibilities include investigating traffic and resource violations, and providing physical security and protection for all employees and visitors.

2. This affidavit is submitted in support of a criminal information charging that on or about August 22, 2020, at Manassas National Battlefield Park, in the special maritime and territorial jurisdiction of the United States, within the Eastern District of Virginia, CARLISS TOWANDA MIMS KIZER did commit vandalism by damaging property, in violation of 36 C.F.R. § 2.31(a)(3).

3. The facts and information contained in this affidavit are based upon my personal knowledge of the investigation, as well as the observations of other law enforcement officers involved in this investigation. All observations that were not personally made by me were related to me by the person(s) who made such observations or are based on my review of records and documents.

4. This affidavit contains the information necessary to support probable cause. The affidavit does not include each and every fact observed by me or known to the United States.

PROBABLE CAUSE

5. On August 20, 2020, windows were broken on four vehicles parked at the unfinished railroad lot at the Park. Specifically:

a. The front passenger side window of Vehicle #1 was shattered. The driver of this vehicle, M.Q.C., reported that approximately \$900 and a pair of sunglasses were stolen from his vehicle's glovebox.

b. The front passenger side window of Vehicle #2 was shattered. The driver of this vehicle, L.M., reported that nothing was stolen from the vehicle.

c. The front passenger side window of Vehicle #3 was shattered. The driver of this vehicle, A.L., reported that nothing was stolen from the vehicle.

d. The front passenger side window of Vehicle #4 was shattered. The driver of this vehicle, M.A., reported that her purse, which contained her identification, \$40, one credit card, and one debit card was stolen from the vehicle. The debit card was used to buy a \$500 gift card (a total charge of \$505.95) at the Harris Teeter grocery store on Heathcote Boulevard in Gainesville, Virginia. The purchase was made that same day, August 20, 2020, before M.A. had returned from her hike find to find the vehicle damage and purse stolen. That Harris Teeter store is approximately seven miles away from the unfinished railroad parking lot.

6. Investigators obtained video and photos from the Harris Teeter store on August 20, 2020, just hours after the incident. The exterior images showed a male exit from the passenger seat of a black SUV. That same male then purchased the gift card, referenced above, at the store's

customer service desk. What appeared to be the same SUV picked up the male after the transaction. The SUV did not have a front license plate.

7. On August 22, 2020, windows of three vehicles parked at the Park were broken. Specifically:

a. The passenger's side window of Vehicle #5, which was parked at the Park's headquarters lot, was shattered. The driver of this vehicle, T.D., reported that her purse, containing her employee identification, \$60, three credit cards, and three debit cards were stolen from the vehicle. One of the debit cards inside of T.D.'s purse belonged to T.D.'s mother, S.K. S.K.'s card was used on the same day, August 22, 2020, to buy a \$500 gift card (a total charge of \$505.95) at the same Harris Teeter grocery store in Gainesville, Virginia. This purchase was made before T.D. returned from her approximately one-hour hike.

b. The front passenger's side window of Vehicle #6 was cracked in two different places but did not shatter. The driver of the vehicle, D.S., reported that no items were stolen.

c. Vehicle #7 had its front and rear passenger's side windows shattered. The driver of the vehicle, T.D., reported that her purse, which contained her identification and a debit card, and an iPad, were stolen. TD's debit card was used to buy a \$500 gift card (a total charge of \$505.95), at the same Harris Teeter in Gainesville, Virginia.

8. T.D., the driver of vehicle #7, told investigators that she had observed a black female, wearing a black and white striped one-piece outfit and big white earrings, alone in a black SUV near where T.D. had parked her car. T.D. said that this woman had watched her while she hid her purse and iPad under a dog blanket behind the driver's seat before she began her hike at the Park.

9. That same day, August 22, 2020, video and photo evidence from the Harris Teeter store showed a black woman wearing a black and white striped one-piece outfit enter the store with a male. The male appeared to be the same individual observed in the images from August 20, 2020. The video showed the male use a credit card to purchase a \$500 gift card from the customer service desk. The couple left the store together.

10. On the same day approximately two hours after the first report of a car clout at headquarters, there were two more thefts from automobiles at the Matthew's Hill parking lot at the Park was reported.

a. Vehicle #8 had its rear driver's side window was shattered. F.O., the driver of the vehicle, reported that her tan Coach purse and wallet were stolen.

b. Vehicle #9 had its front passenger's side window cracked and rear passenger's side window shattered. E.K., the driver of the vehicle, reported that her red leather purse, containing approximately \$100 and two credit cards, were stolen.

11. H.L., who was hiking with E.K., reported that he had observed a smaller black SUV parked behind him in the parking lot when they began their hike. H.L. said that the he saw only one occupant, a black woman, in the vehicle. H.L. said that this woman did not exit her vehicle before he began his hike.

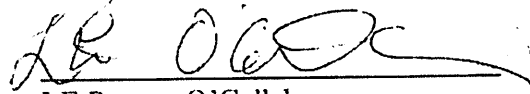
12. While I was collecting evidence at Matthew's Hill, officers with the Prince William County Police Department observed a black female, later identified as MIMS KIZER, wearing big white earrings drive a small black SUV into the same Harris Teeter parking lot. She was alone and was wearing a black and white one-piece outfit.

13. The SUV driven by MIMS KIZER was a rented 2020 Ford Edge Titanium SUV registered in Florida. The vehicle did not have a front license plate, as Florida law does not require one.


14. A search MIMS KIZER's SUV revealed multiple purses, identification, credit cards, debit cards, cash, and other miscellaneous personal items mixed together in the back seat. Officers also collected shards of broken glass from the back seat of the SUV. Among the items recovered were T.D.'s purse, identification, three debit cards, and three credit cards; F.O.'s purse and wallet, identification, Costco card, check book, and debit card; and E.K.'s wallet and identification.

CONCLUSION

15. Based on the facts and information presented above, I respectfully submit there is probable cause to believe that at Manassas National Battlefield Park, in the special maritime and territorial jurisdiction of the United States, within the Eastern District of Virginia, CARLISS TOWANDA MIMS KIZER did commit vandalism by damaging property, in violation of 36 C.F.R. § 2.31(a)(3).


LE Ranger O'Callahan
National Park Service

Subscribed and sworn to before me on October 1, 2020


Notary Public

